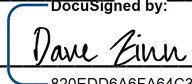


# Exhibit A

### Declaration of Dave Zinn in Support of Plaintiffs' Motion for Alternative Service

1. I know the facts set forth in this declaration of my own knowledge and, if sworn as a witness before this court or any other tribunal could and would competently testify thereto.
2. I am of sound mind and of the age of majority.
3. I was retained by counsel for Plaintiffs in this matter to attempt to locate Catherine Coley, Changpeng Zhao, Yi He, and Ted Lin (the "Individual Defendants").
4. I have been a private investigator for over ten years.
5. I hold an Arizona private investigator's license through the Arizona Department of Public Safety.
6. As a private investigator I have participated in multiple successful attempts to track down, and conduct surveillance on, foreign individuals.
7. Prior to becoming a private investigator, I worked as a bounty hunter for six years and served in the US Marine Corps for eight years.
8. As a marine, I served in Iraq where I lead the provincial governor of Kut's personal security detail and provided security for, among other things, classified information, diplomatic personnel, and property.
9. In order to attempt to ascertain the whereabouts of the Individual Defendants, I utilized a variety of open source and proprietary investigative databases.
10. My results and findings are detailed in my attached report.
11. Despite my efforts, which I consider exhaustive given the time constraints of litigation, I was unable to definitively ascertain even in which country Changpeng Zhao, Yi He, and Ted Lin were located and was also unable to definitively ascertain a state of residence for Catherine Coley.
12. It is within my knowledge and training that highly technologically sophisticated individuals such as the Individual Defendants have the expertise and knowledge to conceal or erase their digital footprints to live and remain "virtually" undetectable, especially to private parties without the resources of law enforcement.
13. I was able to collate many relevant, current, and active social media accounts for each of the Individual Defendants and these are noted in my report.

I declare under penalty of perjury under the laws of The United States of America that the foregoing is true and correct and that this declaration was executed on this 11/10/2021, at Elfrida, Arizona (city), (state).

Signature:  Printed Name: Dave Zinn

DocuSigned by: 820EDD6A6FA64C3...

## VENATOR SERVICES INC



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MANDATE: Locate contact information for defendants Catherine Coley, Changpeng Zhao, Ted Lin, Yi He.

## VENATOR SERVICES INC

- I. Subject #1: Catherine Coley – 32 – suggest sub-serve at parents' address, PR address, and all social media.
  - A. Possible current addresses:
    1. 140 Cortland Ave, Winter Park, FL 32789 – appears to be parents' address
    2. 303 Beach Rd N, Wilmington, NC 28411
    3. 1865 Calle McLeary, San Juan, PR 00911
  - B. Possible phone numbers:
    1. 407-629-1787
    2. 407-716-1694
    3. 919-850-0830
  - C. Possible email
    1. [mcoley82@hotmail.com](mailto:mcoley82@hotmail.com)
    2. [catherine.coley@binance.com](mailto:catherine.coley@binance.com) (appears to be the correct format)
  - D. Possible Aliases:
    1. Johana Gimenez
    2. Johana T Gimenez
    3. Johanna T Gimenez
    4. T Gimenez Johana
    5. Gimenez Johana
  - E. Relatives:
    1. Elwood Coley (66, possible father)
      - a) 213 E Franklin St #304 Chapel Hill, NC 27514
      - b) 140 Cortland Ave #140, Winter Park, FL 32789
      - c) 303 Beach Rd N, Wilmington, NC 28411
    2. Melanie Coley (64, possible mother)
      - a) 213 E Franklin St #304 Chapel Hill, NC 27514
      - b) 140 Cortland Ave, Winter Park, FL 32789
    3. Calvert Coley (35, possible brother)
      - a) 10 Buttonhook Rd, Chappaqua, NY 10514
      - b) 550 Vanderbilt Ave #903, Brooklyn, NY 11238
      - c) 303 Beach Rd N, Wilmington, NC 28411
      - d) 20 Exchange Pl #3604, New York, NY 10005
    4. Ruby Coley (94, possible grandmother)
      - a) 313 Cedar Club Circ, #103 Chapel Hill, NC 27517
      - b) 542 W Barbee Cxhapel Rd, #2, Chapel Hill, NC 27517
    5. Elizabeth Coley Fralin (58, possible aunt)
      - a) 216 E Brook Run Dr, Richmond, VA 23238
      - b) 9119 Stony Point Pkwy, #4101, Richmond, VA 23235
  - F. Business Address:
    1. One Letterman Drive, Building C Suite C3-800, San Francisco, CA 94129
  - G. Social Media
    1. <https://www.linkedin.com/in/catherinegcoley/>
    2. <https://twitter.com/cryptocoley>
    3. <https://twitter.com/cryp1tooley>
    4. <https://www.instagram.com/cryptocoley.us/>
    5. <https://www.facebook.com/CryptoColey/>

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6. <https://steemit.com/@cryptocoley>
  7. <https://www.pscp.tv/cryptocoley/>
- II. Subject #2 - Ted Lin – suggest serve via Twitter accounts
- A. Supposedly lives or lived in Dallas. Attended Cornell University in Ithaca. Not enough information available to narrow down database results to the correct individual.
    1. One profile found in Ithaca – two current addresses
      - a) 151 Dryden Rd #529, Ithaca NY
      - b) 1410 Columbia Rd #16F Boston, MA
    2. One profile found in Dallas – 70 year old female
  - B. Social Media
    1. <https://www.linkedin.com/in/ted-lin/>
    2. <https://www.linkedin.com/in/ted-lin-545a4491/>
    3. [https://twitter.com/Teddy\\_Lin](https://twitter.com/Teddy_Lin) – updated 12 Oct 2021
- III. Subject #3: Changpeng Zhao – suggest serving via twitter account
- A. Lived in British Columbia
  - B. Attended McGill University in Montreal
  - C. Possible addresses:
    1. 98 Albert St Apt C, North Arlington, NJ 07031
      - a) Other possible residents:
        - i. Laurel Yunju Lou
        - ii. Edwardo Martinez
        - iii. Melvin Torres
        - iv. “Chang Zhao”
        - v. Joalsa Alcantara
    2. 98 Albert St Apt 3, North Arlington, NJ 07031
    3. May reside in Taiwan, per complaint in class-action filed in 2020 against Binance, Zhao, He Yi, Roger Wang: [https://securities.stanford.edu/filings-documents/1073/B0300\\_01/202043\\_f01c\\_20CV02803.pdf](https://securities.stanford.edu/filings-documents/1073/B0300_01/202043_f01c_20CV02803.pdf)
  - D. Possible phone number:
    1. 646-431-6131 (probably not current)
  - E. Possible email addresses
    1. [cpzhao@binance.com](mailto:cpzhao@binance.com)
    2. [changpeng.zhao@binance.com](mailto:changpeng.zhao@binance.com)
  - F. Social media
    1. <https://www.linkedin.com/in/cpzhao/>
    2. [https://keybase.io/cz\\_binance](https://keybase.io/cz_binance)
    3. <https://www.reddit.com/user/cpzhao/>
    4. [https://twitter.com/cz\\_binance/](https://twitter.com/cz_binance/) - updated 13 Oct 2021
    5. <https://www.facebook.com/cpzhao>
    6. [https://www.pscp.tv/cz\\_binance/](https://www.pscp.tv/cz_binance/)
  - G. Unverified social media
    1. <https://en.gravatar.com/cpzhao>
    2. <https://steemit.com/@cpzhao>
    3. <https://telegram.me/cpzhao>
    4. <https://cpzhao.livejournal.com>

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5. <https://github.com/cpzhao>
6. <https://www.youtube.com/c/ChangpengZhao>
7. <https://open.spotify.com/user/cpzhao>
8. <https://www.slideshare.net/cpzhao>
9. <https://cpzhao.blogspot.com>
10. [https://mastodon.social/@cz\\_binance](https://mastodon.social/@cz_binance)
11. [https://www.twitch.tv/cz\\_binance](https://www.twitch.tv/cz_binance)
12. [https://www.pinterest.com/cz\\_binance/](https://www.pinterest.com/cz_binance/)
13. [bbcstaticminer.co/CZ\\_BINANCE](https://bbcstaticminer.co/CZ_BINANCE)
14. <https://www.roblox.com/users/2599072402/profile>
15. [https://disqus.com/by/cz\\_binance/](https://disqus.com/by/cz_binance/)

## H. Binance social media

1. <https://www.reddit.com/r/binance>
2. <https://www.reddit.com/r/BinanceExchange/>
3. <https://twitter.com/binance>
4. <https://www.facebook.com/binance>
5. <https://disqus.com/by/binance/>
6. <https://steamcommunity.com/id/binance>

## I. Miscellaneous

1. Tax lien from 2009 in the amount of \$34,776
2. Possible associate: Wei L Yang (77)

## IV. Subject #4: Yi He – recommend serving via twitter

- A. Not enough information available to narrow down database results to the correct individual.
- B. May reside in Malta, per complaint in class-action filed in 2020 against Binance, Zhao, He Yi, Roger Wang: [https://securities.stanford.edu/filings-documents/1073/B0300\\_01/202043\\_f01c\\_20CV02803.pdf](https://securities.stanford.edu/filings-documents/1073/B0300_01/202043_f01c_20CV02803.pdf)

## C. Social Media

1. <https://www.linkedin.com/in/何一-yi-he-3ab04521b/>
2. <https://twitter.com/heyibinance> – updated 01 Oct 2021